

Exhibit C

From: Matthew James <DelMJames@house.virginia.gov>
Sent: Tuesday, April 07, 2015 2:42 PM
To: Walrath, Jennifer M.
Cc: RSpear@perkinscoie.com; Braden, E. Mark
Subject: Bethune-Hill v. Virginia State Board of Elections, et al. - Waiver
Attachments: SKMBT_C45415040714220.pdf; ATT00001.htm

Ms. Walrath:

Please find attached a waiver signed by Delegate Matthew James pursuant to the above-referenced matter.

Thank you.

Kim Rollins
Office of Delegate Matthew James
P.O. Box 7487
Portsmouth, VA 23707
(757) 967-7583 - office

April 7, 2015

E. Mark Braden
Jennifer M. Walrath
Katherine L. McKnight
BAKER HOSTETLER, LLP
1050 Connecticut Ave. NW, Ste. 1100
Washington, DC 20036
*Attorneys for Intervenor- Defendants, the
Virginia House of Delegates and Speaker William J. Howell*

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PERKINS COIE, LLP
700 13TH St. NW, Ste. 600
Washington, DC 20005-3960
Attorneys for Plaintiffs

*RE: Bethune-Hill v. Virginia State Board of Elections
Case No.: 3:14-cv-00852*

Dear Sir or Madam:

Please be advised that pursuant to your request, this email is sent with the intent to waive my legislative privilege with respect to my email communications in this matter as it pertains to discovery requests seeking documents within the possession, custody, or control of the Virginia House of Delegates regarding the 2011 House of Delegates redistricting process.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew James", written over a horizontal line.

Matthew James
Member, Virginia House of Delegates
80th District

JOANNOU & ASSOCIATES

Representing Injured Persons

709 Court Street, Portsmouth, Virginia 23704

Tidewater: (757) 399.1700

Facsimile: (757) 397.6624

John S. Joannou, Esquire
Richard H. Roston, Esquire

Harold Gavaris
of Counsel

April 7, 2015

Jennifer M. Walrath, Esq.
1050 Connecticut Ave., N.W. Suite 1100
Washington, DC 20036

Fax: -202-861-1783

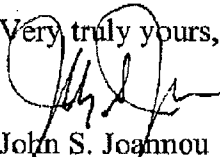
RE: Bethune-Hill v. Virginia State Board of Elections, No. 3:14-cv-00852
Pending, U.S. District Court, Eastern District of Virginia

Dear Ms. Walrath:

Please be advised that I intend to waive Legislative Privilege with respect to your e-mail communications in the above cited case.

Thanking you, I remain,

Very truly yours,



John S. Joannou

JSJ:ls

From: Jennifer L McClellan <DelJMcClellan@house.virginia.gov>
Sent: Tuesday, April 07, 2015 2:24 AM
To: Walrath, Jennifer M.
Cc: Braden, E. Mark; Spear, Ryan M. (Perkins Coie) (RSpear@perkinscoie.com)
Subject: Re: Bethune-Hill, et al. v. Virginia Board of Elections, et al., No. 3:14-cv-000852-REP-GBL-BMK

I waive any legislative privilege with respect to my email communications responsive to the discovery request referenced in your letter of April 1, 2015 in the above referenced case. I also request that Intervenor's counsel provide me with a copy of any emails to or from me deemed responsive so far.

Sincerely,

Jennifer L. McClellan
Virginia House of Delegates
71st District
(804) 698-1171

From: Walrath, Jennifer M. <jwalrath@bakerlaw.com>
Sent: Wednesday, April 01, 2015 12:15 PM
To: Jennifer L McClellan
Cc: Braden, E. Mark; Spear, Ryan M. (Perkins Coie) (RSpear@perkinscoie.com)
Subject: Bethune-Hill, et al. v. Virginia Board of Elections, et al., No. 3:14-cv-000852-REP-GBL-BMK

Delegate McClellan,

Please see the attached correspondence concerning the above-referenced matter.

Regards,
Jennifer

Jennifer Walrath | BakerHostetler
Washington Square | 1050 Connecticut Avenue, N.W., Suite 1100 | Washington, D.C. 20036-5304
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jwalrath@bakerlaw.com

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present in this email, or any attachment, that have arisen as a result of e-mail transmission.

From: Mark Sickles <marksickles@gmail.com>
Sent: Tuesday, April 07, 2015 3:19 PM
To: Walrath, Jennifer M.; rspear@perkinscoie.com
Subject: waiver

To Whom it May Concern:

I am writing to inform you that I am waiving legislative privilege with respect to my email communications about the 2011 House of Delegates redistricting. Please contact my assistant James Heo if you have further questions.

Best,

Mark Sickles

James Heo
Legislative Assistant
Delegate Mark Sickles (D-Franconia)
Mobile: (760) 533-7262
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